



James L. Wallace

Director, Project Sunshine

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January 29, 2019

**CERTIFIED MAIL
RETURN RECEIPT REQUESTED**

Director, Air Enforcement Division
Office of Regulatory Enforcement
U.S. Environmental Protection Agency
Ariel Rios Building
Mail Code 2242-A
1200 Pennsylvania Avenue, N.W.
Washington, D.C. 20460-0001

Re: United States, et.al. v. BP Exploration & Oil, et.al.
Northern District of Indiana, Hammond Division
Civil Action No. 2:96 CV 095 RL

United States v. BP Products North America In. and BP-Husky Refining LLC
Norther District of Ohio, Western Division
Civil Action No: TBD (Draft)

LDAR Audit Reports: BP and BP-Husky Refineries

Dear Sir or Madam:

NO EPA ACTION REQUIRED; For Information Only

The following information is provided for the Leak Detection and Repair (LDAR) audit reporting requirements of the above referenced Civil Action (paragraph 20.R) and the above referenced draft Civil Action (paragraph 31.b).

Please find attached the 2018 BP Cherry Point Refinery and 2018 BP-Husky Toledo Refinery LDAR audit reports.

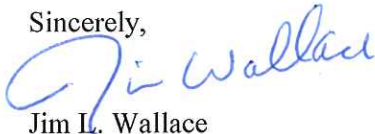
Based on the results of BP Cherry audit, according to paragraph 20.R of the above referenced civil action, BP Cherry Point Refinery does not plan to implement any changes to the LDAR program; therefore, will not be submitting a summary of changes.

Based on the results of Toledo Refinery audit, according to paragraph 20.R of the above referenced civil

action and paragraph 31.b of the above referenced draft civil action, BP-Husky Toledo Refinery submits the changes to the LDAR program in the form the attached final Corrective Action Plan. The certification of the completion of the corrective actions is also attached.

Please contact John Wigger (630) 697-4522 if you have any questions.

Sincerely,



Jim L. Wallace
Director, Project Sunshine

Enclosures (3)

cc: Director, Air Enforcement Division
U.S. Environmental Protection Agency
c/o MATRIX New World Engineering, Inc.
NJ/Corporate Headquarters
26 Columbia Turnpike
Florham Park, NJ 07932

Chief, Air Enforcement and Compliance Assurance Branch Air and Radiation
Division, AE-17J
U.S. Environmental Protection Agency, Region V
77 West Jackson Boulevard
Chicago, IL 60604-3590
Attn: Compliance Tracker

Office of Regional Counsel
U.S. EPA, Region 5
77 West Jackson Blvd. (C-14J)
Chicago, IL 60604

Ohio EPA
Division of Air Pollution Control
50 West Town Street, Suite 700
Columbus, Ohio 43216-1049
Attention: James Kavalec, Manager Compliance and Enforcement Section

City of Toledo
Division of Environmental Services
348 South Erie Street
Toledo, Ohio 43604
Attention: Karen Granata, Administrator

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